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HealthCore

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Henry Ford Health Sciences Center

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The Fund for Henry Ford Hospital

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February 3, 2006

MDCH CONFERENCE

2006 FEB 10 PM 2:06

Norma Hagenow, Chair
Certificate of Need Commission
Health Facilities Section - Certificate of Need
320 S. Walnut Street
Lewis Cass Building
Lansing, MI 48913

RE: CON Review Standards for Bone Marrow Transplant

Dear Commissioner Hagenow,

Thank you for the opportunity to provide comments on the CON review standards for Bone Marrow Transplant (BMT) through the public hearing process.

The existing review standards allow for three adult services to be approved in the state. Currently, four adult bone marrow transplantation services are approved in Michigan. It would therefore seem unnecessary to increase the number since we are already in excess of what has previously been identified as the needed number of centers to adequately serve the population.

Bone marrow transplantation is a low-volume service (approximately 400 - 450 Michigan cases annually) that, despite substantial reductions in length of stay, requires significant resources and exceptional training for the providers of care. All of these reasons support the notion that no additional bone marrow transplant services are needed. At the present time, patients who require this service have excellent access to service within a reasonable timeframe, especially in Southeast Michigan where all of the adult BMT programs are located. While an argument could be made that residents outside of Southeast Michigan must travel longer distances for bone marrow transplantation, increasing the number of centers in Southeast Michigan would simply result in a costly duplication of services that are already available. Any increase would simply dilute the volume that is currently being experienced at existing centers.

While some of the care has transitioned to the ambulatory arena, these patients are, nonetheless, in a fragile medical condition that may require immediate access to more complex testing or treatments at any time in their care. For this reason, it makes sense that the provider be able to provide, onsite, the services that are identified in Section 3 of the current standards. These requirements were put in place for the safety and care of the patient and should not be eliminated or reduced.

On behalf of Henry Ford Health System, I am pleased to make these comments on the CON review standards for bone marrow transplantation services and thank you for the opportunity to do so.

Yours Sincerely

Elizabeth C. Palazzolo
Director, Planning & Research